

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re: ) Case No. 24-30168  
 ) (Chapter 11)  
STARK ENERGY, INC. )  
 )  
Debtor. )  
 )  
\_\_\_\_\_

**APPLICATION TO APPROVE EMPLOYMENT OF MAURICE B. VERSTANDIG,  
ESQ. AND THE DAKOTA BANKRUPTCY FIRM AS CO-COUNSEL  
TO ERIK A. AHLGREN, ESQ. AND THE AHLGREN LAW OFFICE, PLLC**

Comes now Stark Energy, Inc. (“Stark Energy” or the “Debtor”), pursuant to Sections 327 and 329 of Title 11 of the United States Code (the “Bankruptcy Code”), as well as Federal Rule of Bankruptcy Procedure 2014, and applies to engage Maurice B. VerStandig, Esq. and The Dakota Bankruptcy Firm (collectively, “Co-Counsel”), as co-counsel to Erik A. Ahlgren, Esq. and The Ahlgren Law Office, PLLC (“Primary Counsel”) in this matter, and in support thereof states as follows:

1. This case was commenced when the Debtor filed a petition for Chapter 11 relief, pursuant to Section 301 of the Bankruptcy Code, on April 23, 2024.
2. The Debtor is, and at all times relevant has been, a debtor in possession.
3. Approval is instantly sought of Co-Counsel’s employment to provide the following services to the Debtor as general reorganization counsel:
  - a. Work with Primary Counsel, as needed and appropriate while avoiding duplication of work, to prepare and file all necessary pleadings, motions, and other court papers, on behalf of the Debtor;
  - b. Work with Primary Counsel, as needed and appropriate while avoiding duplication of work, to negotiate with creditors and other interested parties;

c. Work with Primary Counsel, as needed and appropriate while avoiding duplication of work, to prepare a plan of reorganization on behalf of the Debtor;

d. Appear at various hearings herein on June 13, 2024, addressing a pending motion for leave to enter into a post-petition factoring arrangement and participating in a status conference pursuant to Section 1188 of the Bankruptcy Code; and

e. Tend to such other and further matters as are necessary and appropriate in the prism of this case.

4. Co-Counsel does not represent any other person or entity in connection with this case, and both Co-Counsel and its principal are disinterested as that term is used in Section 101(14) of the Bankruptcy Code. Co-Counsel is not a creditor or an insider of the Debtor; was not, within two years before the date of the petition for relief, a director, officer, or employee of the Debtor; and does not have any interest materially adverse to the interests of the estate or any class of creditors or equity holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor (or for any other reason). Further, Co-Counsel holds no interest adverse to the interests of the Debtor in connection with any of the matters for which employment is sought.

5. Co-Counsel has no legal connection with the Debtor, the creditors herein, or any other parties in interest, nor with their respective counsel, nor with the United States Trustee or any person employed in the office of the United States Trustee, except as expressly disclosed in the affidavit of Maurice B. VerStandig attached hereto.

6. For the avoidance of doubt, Co-Counsel does *not* represent the equity interest of the Debtor.

7. Co-Counsel has agreed to represent the Debtor at the rate of Three Hundred Dollars and No Cents (\$300.00) per hour for partner time, Two Hundred Dollars and No Cents (\$200.00)

for associate time, and One Hundred Dollars and No Cents (\$100.00) per hour for paralegal time; it is respectfully suggested these proposed rates are fair and reasonable, and these rates are consistent with the skills and reputation of Co-Counsel and its principal attorney.

8. All compensation sought in this matter will be subject to the review and approval of the United States Bankruptcy Court for the District of North Dakota.

9. Attached hereto, and incorporated herein by reference, is the declaration of Maurice B. VerStandig, Esq. in support of this application.

WHEREFORE, the Debtor respectfully prays this Honorable Court (i) enter an order approving the employment of Maurice B. VerStandig, Esq. and The Dakota Bankruptcy Firm as co-counsel to Primary Counsel for the Debtor; and (ii) afford such other and further relief as may be just and proper.

Respectfully submitted,

Dated: June 10, 2024

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.  
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Fargo, North Dakota 58102-4246  
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mac@dakotabankruptcy.com  
*Proposed Co-Counsel for the Debtor*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10th day of June, 2024, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig